

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Facilitating the Deployment of Text-to-911 and	)	PS Docket No. 11-153
Other Next Generation 911 Applications	)	
	)	
Framework for Next Generation 911 Deployment	)	PS Docket No. 10-255

To: The Commission

**COMMENTS OF THE RURAL WIRELESS ASSOCIATION, INC.**

The Rural Wireless Association, Inc. (“RWA”)<sup>1</sup> files these comments in response to the Federal Communications Commission’s (“FCC” or “Commission”) Third Further Notice of Proposed Rulemaking in the above-captioned application.<sup>2</sup> While RWA agrees with the Commission as to the importance of accurate information in enabling users of mobile communications devices to send text messages to 911, compliance with the proposed deadline for wireless carriers to deliver enhanced location information to requesting Public Safety Answer Points (“PSAPs”) is not feasible for most small carriers. Similarly, compliance with the proposed deadline for wireless carriers to provide roaming support is also not feasible. While small rural wireless carriers should ultimately be capable of delivering enhanced location

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<sup>1</sup> RWA is a 501(c)(6) trade association dedicated to promoting wireless opportunities for rural telecommunications companies who serve rural consumers and those consumers traveling to rural America. RWA’s members are small businesses serving or seeking to serve secondary, tertiary, and rural markets. RWA’s members are comprised of both independent wireless carriers and wireless carriers that are affiliated with rural telephone companies. Each of RWA’s member companies serves fewer than 100,000 subscribers.

<sup>2</sup> *In the Matter of Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications; Framework for Next Generation 911 Deployment*, Second Report and Order and Third Further Notice of Proposed Rulemaking, PS Docket No. 11-153, PS Docket No. 10-255 (rel. August 13, 2014) (“NPRM”).

information and supporting roaming, it will take more than two years before such carriers are capable of implementing the necessary technical solutions to existing impediments.

**I. It is Premature to Require the Provision of Enhanced Location Information with Texts to 911**

It will take more than two years for most small wireless carriers to be in a position to feasibly provide enhanced location information with texts to 911. There are numerous obstacles, both technical and financial, to small rural carriers seeking to provide enhanced location information. In June, the FCC’s Communications Security, Reliability and Interoperability Council’s (“CSRIC”) Working Group 1 issued a report concluding that achieving enhanced location capabilities will require user equipment changes, network changes, or both, and recommending the continued use of coarse location for routing SMS text messages to 911. The report concluded that “existing technologies, upon which the SMS text to 9-1-1 service is based, face challenges and provide for extremely limited additional standards development” and therefore CSRIC recommended “that the FCC refrain from wireless E9-1-1 Phase II-like mandates for SMS text to 9-1-1 service.”<sup>3</sup> The cost of upgrading existing PDE networks may run upwards of \$500,000, a substantial expenditure for small carriers lacking a large customer base from which they can recover costs. How long it will take small rural carriers to be able to deliver enhanced location information will depend in large part on the timeline for development of technical standards. RWA expects that it will be at least two years after standards not tied to patented technology are developed before its members will be capable of delivering enhanced location information.

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<sup>3</sup> Communications Security, Reliability and Interoperability Council, Working Group 1, Next Generation 9-1-1, Task 1 Subtask 1, Final Report – Investigation into Location Improvements for Interim SMS (Text) to 9-1-1, June, 2014.

## **II. Two Years is Insufficient Time for Wireless Carriers to Support Roaming**

In its NPRM, the Commission correctly recognized that technical issues currently prevent CMRS providers from routing roaming text-to-911 messages to the correct, nearest PSAPs on the roaming carrier's network. While updating the current text-to-911 standard for SMS to a "hub and spoke approach" where carriers' location platforms would interconnect into a centralized hub which could make cell sector information to all connected providers is a feasible solution to the roaming issue, such an approach is not capable of being implemented within two years. RWA estimates that it will be at least three years before implementation of such an approach could realistically be completed. Alternatively, the approach proposed by the National Emergency Number Association ("NENA") – that the Commission establish a three year deadline (December 31, 2017) for roaming support on existing platforms, extendable to five years (December 31, 2019) for carriers who commit to supporting next generation compatible text service on a network-wide basis by that date – is feasible.

Respectfully submitted,

**RURAL WIRELESS ASSOCIATION, INC.**

By: */s/ Caressa D. Bennet*

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